

## U.S. Department of Justice

## United States Attorney Eastern District of New York

SDD F.#2011R00783 271 Cadman Plaza East

Brooklyn, New York 11201

December 23, 2011

## Via Federal Express

Nancy Lee Ennis, Esq. Quijano & Ennis 381 Park Avenue South, Suite 701 New York, NY 10016

> Re: United States v. Agron Hasbajrami, Criminal Docket No. 11-623 (JG)

Dear Ms. Ennis:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find additional discovery materials, provided under the terms of the Protective Order Pertaining to Unclassified Discovery Materials entered by the Court on November 16, 2011 (the "Order"), and the December 23, 2011 stipulation between the parties regarding draft summary translations of foreign language documents. Pursuant to ¶ 3 of the Order, the enclosed documents are SENSITIVE DISCOVERY MATERIALS and must be handled accordingly.

Enclosed please find copies of the defendant's email communications, along with draft summary foreign language translations, Bates-stamped 83 to 287. In addition, enclosed please find copies of the defendant's Western Union wire transfer records, on a CD Bates-numbered 288, and JPMorgan Chase banking records, on a CD Bates-numbered 289, along with hard copy printouts of the defendant's Western Union and Moneygram records, Bates-numbered 290 to 304.

In addition, a copy of a search warrant for the defendant's residence along with the underlying application is enclosed, Bates-numbered 305 to 340. Also enclosed please find draft summary translations of documents recovered from the

defendant's residence pursuant to the execution of the search warrant, Bates-numbered 341 to 368. Lastly, enclosed please find an FBI report listing the items recovered from the defendant at the times of his arrest, Bates-numbered 369 to 370. We will make the items listed available for your inspection at your request.

In addition, the government is in possession of digital media seized from the defendant's computer. If you will kindly provide us with a two-terabyte hard drive, we will arrange to make a copy of this information for your review. In the alternative, if you would prefer, we can make the computer materials available for your inspection at a mutually agreeable time and location.

If you have any questions or requests, please do not hesitate to contact us. The government will supplement this letter as appropriate.

Very truly yours,

LORETTA E. LYNCH United States Attorney

By: /s/

Matthew Amatruda Seth D. DuCharme

Assistant United States Attorneys

(718) 254-7012/6021

Enclosures

cc: Clerk of Court (JG) (w/o enclosures)